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December 14, 2017

Electronic Filing

Ms. Sandra J. Paske
Secretary to the Commission
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Mount Pleasant Tech Interconnection Project (MPTIP)
Docket No. 137-CE-188

Subject: Submittal of Draft Application Information

Dear Ms. Paske:

Per the Commission's October 20, 2017 request, American Transmission Company (ATC), submits the following draft Application information. This is draft information and being filed as correspondence. ATC anticipates filing the complete Application in February of 2018.

1. Sections 1.3, 1.4, 5.1, and 5.2 of the Application (below)
2. Section 1.9 Maps – filed on ERF in PDF (electronic filing)
3. Section 1.10 GIS Files – provided as a DVD (Fed Ex delivery)
4. Section 1.11 Mailing Lists – provided as a CD (Fed Ex delivery)
5. Section 8.1 DNR Tables – filed on ERF in Excel and PDF (electronic filing)

If you have any questions, please contact me at (262) 506-6164 or vlechner@atcllc.com.

Sincerely,

Val Lehner
Regulatory Project Manager
ATC Management Inc.

1.3 Project Location and End Points

The Project is located in southeastern Wisconsin. ATC will construct the new Mount Pleasant Substation in the village of Mount Pleasant in Racine County and will interconnect to Foxconn's new substation (known as PSS). New 345 kV transmission lines will run east for approximately 1.3 miles from the new Mount Pleasant Substation to Line PLPL101 in the village of Mount Pleasant in Racine County. New conductor will be strung on the vacant east side of existing Line PLPL101 beginning at the Racine Substation in the city of Racine and extending approximately 12 miles south to the Pleasant Prairie Switchyard in the village of Pleasant Prairie. The Bain to Pleasant Prairie line (Line PLPL91) will be rerouted in the village of Pleasant Prairie. Additionally, one structure will be modified/replaced as part of the uprate of the Racine to Elm Road line (Line L-ERG91) in the village of Caledonia and two structures will be modified/replaced as part of the uprate of Line L-ERG91 in the city of Racine.

1.4 List of Villages/Cities

The Project will impact the following locations:

- Racine County
 - village of Caledonia
 - city of Racine
 - village of Sturtevant
 - village of Mount Pleasant
- Kenosha County
 - town of Somers
 - village of Somers
 - city of Kenosha
 - village of Pleasant Prairie
- Milwaukee County
 - city of Oak Creek

5.1 Routing and Siting Factors

The Project area was developed to meet the system configuration requirements of connecting the new Mount Pleasant Substation to the existing 345 kV Line PLPL101 between the Pleasant Prairie Switchyard and the Racine Substation as described in the Project Overview. To determine the routes identified in this Application, ATC used a routing and siting process that followed the transmission line siting priorities defined in Wis. Stat. § 1.12(6), and consulted with the Commission, other regulatory agencies, and local officials.

ATC identified potential route corridors between established end points meeting the routing priorities defined in Wis. Stat. § 1.12(6). These priorities are to be used consistent with economic and engineering considerations, reliability of the electric transmission system, and protection of the environment. The statutory siting priorities include, in order of priority:

- Existing utility corridors;

- Highway and railroad corridors;
- Recreational trails to the extent the facilities may be constructed below ground and do not significantly impact environmentally sensitive areas; and
- New corridors.

Potential routes were refined using additional criteria, to the extent practical. These criteria included the following, which are **not** listed in order of priority nor assigned weighted values:

- Location of the end-use customer, Foxconn, and its proximity to an interconnection to ATC's transmission system;
- Location of existing linear infrastructure;
- Use of existing ROWs to minimize the need for additional ROW (corridor sharing);
- County and state road expansion plans including those associated with the Foxconn development;
- Community and landowner impacts;
- Ability to minimize impacts to environmental and natural resource features, including wetlands, waterways, and woodlands;
- Archeological, architectural, tribal, and historic resources;
- Location of airports and airstrips;
- Avoidance of high-density residential areas;
- Conformance with existing and proposed land use patterns;
- Design modifications or construction practices to overcome terrain or other physical challenges; and
- Maintaining compatibility with local agricultural practice.

Additionally, ATC consulted with regulatory agencies including the Commission, USACE, WisDOT, WDNR, FAA, and DATCP. ATC held consultation meetings with the Commission during the pre-filing stage of this Project, beginning in 2017, during which common segments were discussed. In addition, input from local officials and Foxconn representatives was considered in the evaluation of proposed routes.

This detailed routing and siting process resulted in the development of the Preferred and Alternative Routes. Both routes are permittable, buildable routes that comply with Wis. Stat. § 1.12(6). Quantitative weighting criteria was not used to evaluate potential routes for this project.

Common Segments and Facilities: The Project has several common segments in order to most efficiently utilize existing corridors and minimize impacts to the environment and neighboring communities. Segment 2 will utilize the vacant east side of Line PLPL101, an existing double-circuit 345 kV line between the Racine Substation and the Pleasant Prairie Switchyard, in order to maximize the use of existing utility corridors, as prioritized by Wis. Stat. § 1.12(6). Common Segments 1A and 1B are structure modifications/replacements on Line L-ERG91. Segment 3 is a re-route of existing Line PLPL91. Segment 6 connects ATC's Mount Pleasant Substation with Foxconn's substation (PSS) via four underground lines.

ATC selected the location of the Mount Pleasant Substation with the following criteria: (1) to be sited on land under contract to be purchased for future Foxconn project development, (2) to minimize environmental impact (avoidance of a nearby creek), and (3) to align with the future Foxconn substation (PSS).

Preferred and Alternative Routes: Segments 4 (Preferred) and 5 (Alternative) were selected to (1) minimize the length of new line between the new Mount Pleasant Substation and the required interconnection to Line PLPL101, (2) maximize use of parcels that are already under contract to be purchased for future Foxconn project development, and (3) efficiently interconnect with the locations selected for the new Foxconn substation (PSS) and the new Mount Pleasant Substation. Segment 4 was selected as the Preferred Route because it is a shorter, more direct, and less expensive route. Additionally, Segment 4 provides for greater separation between the route and densely populated neighborhoods and potential future development along Braun Road.

5.2 Changes to Existing Easements

Segments 1A, 1B: There are no planned changes to the location or width of existing electric easements in Segments 1A and 1B.

Segment 2: A preliminary analysis of the easements for Line PLPL101 shows that the easements include rights for a second 345 kV transmission line to be added to the existing 345 kV line. ATC does not anticipate rewriting or renegotiating Line PLPL101 easements, with the following exception: ATC is planning to revise its easement with WEPCO at the Pleasant Prairie Power Plant site. That easement includes an extended area between Bain Station Road and STH 50 where the legal description encumbers only a portion of the WEPCO fee-owned corridor. ATC believes that the original intention was to encumber a greater width in that corridor since the existing described width is not adequate for blow-out of the transmission lines. As described in Section 1.7.4 Railroad ROWs, ATC did identify what is believed to be a former rail corridor where a new high voltage easement is necessary from Racine County.

Segment 3: ATC will renegotiate an existing easement with WE Energies for the relocation of Line PLPL91 at the Pleasant Prairie Power Plant site and modify that easement as described above for Segment 2. ATC will relocate Line PLPL91 approximately 500 feet east of its current location; it will be located on the power plant property on the east side of the Canadian Pacific Railway line.

Segments 4, 5, and 6: These segments are all new ROW with no existing easements. ATC will obtain new easements for these segments.